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Attorneys for Plaintiff

Tech-4-Kids, Inc.

**UNITED STATES DISTRICT COURT**

**CENTRAL DISTRICT OF CALIFORNIA**

**WESTERN DIVISION**

TECH-4-KIDS, INC.,

Plaintiff,

vs.

SPORT DIMENSION, INC. and KURT  
RIOS,

Defendants.

SPORT DIMENSION, INC.,

Counterclaimant,

vs.

TECH-4-KIDS, INC.,

Counter-Defendant.

CASE NO. 2:12-CV-06769-PA-AJW

**NOTICE OF SETTLEMENT AND  
JOINT STIPULATION TO  
POSTPONE PRETRIAL  
DEADLINES PENDING  
EXECUTION OF SETTLEMENT  
AGREEMENT**

**[[Proposed] Order Thereon Filed  
Concurrently Herewith]**

**Judge: Honorable Percy Anderson**

1       **WHEREAS**, the parties in this action, Plaintiff and Counter-Defendant Tech-4-  
2 Kids, Inc. and Defendants and Counterclaimants Sport Dimension, Inc. and Kurt Rios  
3 (collectively, the “Parties”), have reached a settlement and are in the process of  
4 documenting the settlement;

5       **WHEREAS**, the settlement includes a dismissal of the entire action with prejudice  
6 as to all parties;

7       **WHEREAS**, Tech-4-Kids’ president, Brad Pedersen is currently traveling in  
8 England and is scheduled to return on or about June 15, 2013;

9       **WHEREAS**, Sport Dimension’s chief executive officer, Joseph Lin, is currently  
10 traveling in Burma and is scheduled to return on or about June 26, 2013;

11       **WHEREAS**, due to Mr. Pedersen’s and Mr. Lin’s travel schedules, the parties  
12 require approximately four weeks to finalize the settlement agreement and file the  
13 dismissal;

14       **WHEREAS**, pursuant to the Court’s Scheduling Order, the parties are scheduled  
15 to file the pretrial conference order, witness lists, exhibits list, memorandum of  
16 contentions of fact and law, jury instructions, and other pretrial documents on June 21,  
17 2013;

18       **WHEREAS**, pursuant to the Court’s Scheduling Order, the Pretrial Conference is  
19 currently scheduled for July 5, 2013, at 1:30 p.m.;

20       **WHEREAS**, trial is scheduled to commence on August 6, 2013;

21       **WHEREAS**, having reached an agreement to resolve this dispute, the parties wish  
22 to avoid burdening the Court with unnecessary filings and to save costs associated with  
23 the pretrial submissions so they can devote their resources to finalizing the settlement;

24       **IT IS THEREFORE STIPULATED AND AGREED** by and between each of  
25 the parties to the above-captioned action, through their counsel of record, that additional  
26 time is requested for the parties to finalize a settlement that will result in final resolution  
27 of this matter with prejudice, and the parties respectfully request that the Court:  
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1 (1) Postpone the deadline for the parties to submit their pretrial documents,  
2 including pretrial conference order, witness lists, exhibit list, memorandum of  
3 contentions of fact and law, and jury instructions, from June 21, 2013 to July 9, 2013, to  
4 allow the parties sufficient time to finalize the settlement and file the dismissal;

5 (2) Continue the Pretrial Conference from July 5, 2013 to a date that is  
6 convenient for the Court during the week of July 15, 2013.

7  
8 DATED: June 11, 2013

**GREENBERG TRAURIG, LLP**

9  
10 By: /s/ Valerie W. Ho  
11 Valerie W. Ho  
12 Attorneys for Plaintiff and Counter-Defendant  
13 Tech-4-Kids, Inc.

14 DATED: June 11, 2013

**STRADLING YOCCA CARLSON & RAUTH**

15  
16 By: /s/ Sarah S. Brooks  
17 Sarah S. Brooks  
18 Attorneys for Defendants and Counter-  
19 Claimants Sport Dimension, Inc. and Kurt  
20 Rios  
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